

UNITED STATES DISTRICT COURT
NORTH DISTRICT OF ILLINOIS
EASTERN DIVISION

LEONARD SOKOLOW, on Behalf of) **Case No. 1:18-Cv-01039**
Himself and All Others Similarly Situated,)
)

Plaintiff,)
)

v.)
)

LJM FUNDS MANAGEMENT, LTD.,)
TWO ROADS SHARED TRUST,)
NORTHERN LIGHTS DISTRIBUTORS,)
LLC, ANDREW ROGERS, MARK)
GERSTEN, MARK GARBIN, NEIL)
KAUFMAN, ANITA KRUG, JAMES)
COLANTINO, ANISH PARVATANENI)
and ANTHONY CAINE,)
)

Defendants.)
)

STANLEY BENNETT, Individually and on) **Case No. 1:18-Cv-01312**
Behalf of All Others Similarly Situated,)
)

Plaintiff,)
)

v.)
)

LJM FUNDS MANAGEMENT, LTD.,)
TWO ROADS SHARED TRUST,)
NORTHERN LIGHTS DISTRIBUTORS,)
LLC, MARK GERSTEN, MARK GARBIN,)
NEIL KAUFMAN, ANITA KRUG, JAMES)
COLANTINO, ANISH PARVATANENI)
and ANTHONY CAINE,)
)

Defendants.)
)

JAMES NOSEWICZ, Individually and on)	Case No. 1:18-cv-01589
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
LJM FUNDS MANAGEMENT, LTD.,)	
TWO ROADS SHARED TRUST,)	
NORTHERN LIGHTS DISTRIBUTORS,)	
LLC, MARK D. GERSTEN, MARK)	
GARBIN, NEIL M. KAUFMAN, ANITA K.)	
KRUG, ANDREW B. ROGERS, JAMES)	
COLANTINO, ANTHONY J. CAINE and)	
ANISH PARVATANENI)	
)	
Defendants.)	

**DECLARATION OF MICHAEL DELL'ANGELO IN SUPPORT OF THE
MOTION OF PARAGON NATIONAL, LP TO CONSOLIDATE ANY
SUBSEQUENTLY-FILED RELATED CASES, APPOINT LEAD PLAINTIFF, AND
APPROVE LEAD PLAINTIFF'S SELECTION OF COUNSEL**

I, Michael Dell'Angelo, declare and say to the best of my knowledge, information and belief as follows:

1. I am a shareholder of the law firm of Berger & Montague, P.C.
2. I submit this Declaration in support of the Motion of Paragon National, LP to Consolidate, Appoint Lead Plaintiff, and Approve Lead Plaintiff's Selection of Counsel, filed pursuant to § 27D of the Securities Act of 1933 (the "1933 Act"), as amended by the Private Securities Litigation Reform Act ("PSLRA"), 15 U.S.C. § 77z-1.
3. Attached as Exhibit 1 is a true and correct copy of the docket in the action captioned *Sokolow v. LJM Fund Management, Ltd., et al.*, No. 1:18-cv-01039 (N.D. Ill.).
4. Attached as Exhibit 2 is a true and correct copy of the PSLRA notice titled "Scott & Scott, Attorneys at Law, LLP Files Class Action Suit Against LJM Funds Management Ltd.

(LJMIX)” regarding the deadline for the filing of motions for lead plaintiff in this litigation that plaintiff Leonard Sokolow, via his counsel, published on February 9, 2018 via *BusinessWire*.

5. Attached as Exhibit 3 is a true and correct copy of the PSLRA Certification of Paragon National, LP with a list of Paragon National, LP’s applicable transactions in LJM Preservation & Growth Fund (“LJMIX”) shares during the class period alleged.

6. Attached as Exhibit 4 is a form of assignment that advisees of TCG Advisors, LP (“TCG Advisors”) were asked to sign in order to assign their individual shares and claims to the newly-formed affiliate of TCG Advisors, Paragon National, LP.

7. Attached as Exhibit 5 is an analysis of Paragon National, LP’s losses.

8. Attached as Exhibit 6 is a copy of the firm résumé of Berger & Montague, P.C.

9. Attached as Exhibit 7 is a copy of the firm résumé of Cafferty Clobes Meriwether & Sprengel LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of April, 2018.


Michael Dell'Angelo